

# EXHIBIT A

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**IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH  
CENTRAL DIVISION, SOUTHERN REGION**

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BLUERIBBON COALITION, INC. *et al.*,

Plaintiffs,

v.

U.S. BUREAU OF LAND MANAGEMENT,  
*et al.*,

Defendants,

and

SOUTHERN UTAH WILDERNESS  
ALLIANCE,

Defendant-Intervenor.

**DECLARATION OF BEN BURR**

Civil No. 4:25-cv-00022-DN

District Judge David Nuffer

I, Ben Burr, being over the age of 21 and having personal knowledge of the facts set forth herein, do declare and state as follows:

1. On April 10, 2025, I traveled to the San Rafael Swell Travel Management Area. The BLM alleges that routes SS1234A, SS1403, SS1001, and SS1547B are alternative motorized access routes to access the historic Marsing Ranch. The access routes for the historic Marsing Ranch are routes SS1404, SS1404A, and SS1235. I traveled on route SS1001 to the point on the route that is the closest you can get to the historic ranch.

2. I observed that this alternative route never got close enough to the actual historical site to discern any of the historical remnants of the ranch. SS1001 is a road cut into the side of the mountain that is extraordinarily high above the river corridor where the ranch is

located. Accessing the ranch from this route would be extremely hazardous, requiring individuals to descend a steep, unstable slope of loose rock without the aid of any established trail. At the canyon floor, a sheer cliff presents an additional barrier, necessitating technical climbing or rappelling to reach the river below. Finally, one would have to cross the river to get to the historic ranch.

3. I declare under penalty of perjury under the laws of the State of Utah that the foregoing is true and correct.

DATED this 24 day of April 2025.

Signature:   
Printed Name: Ben Burr

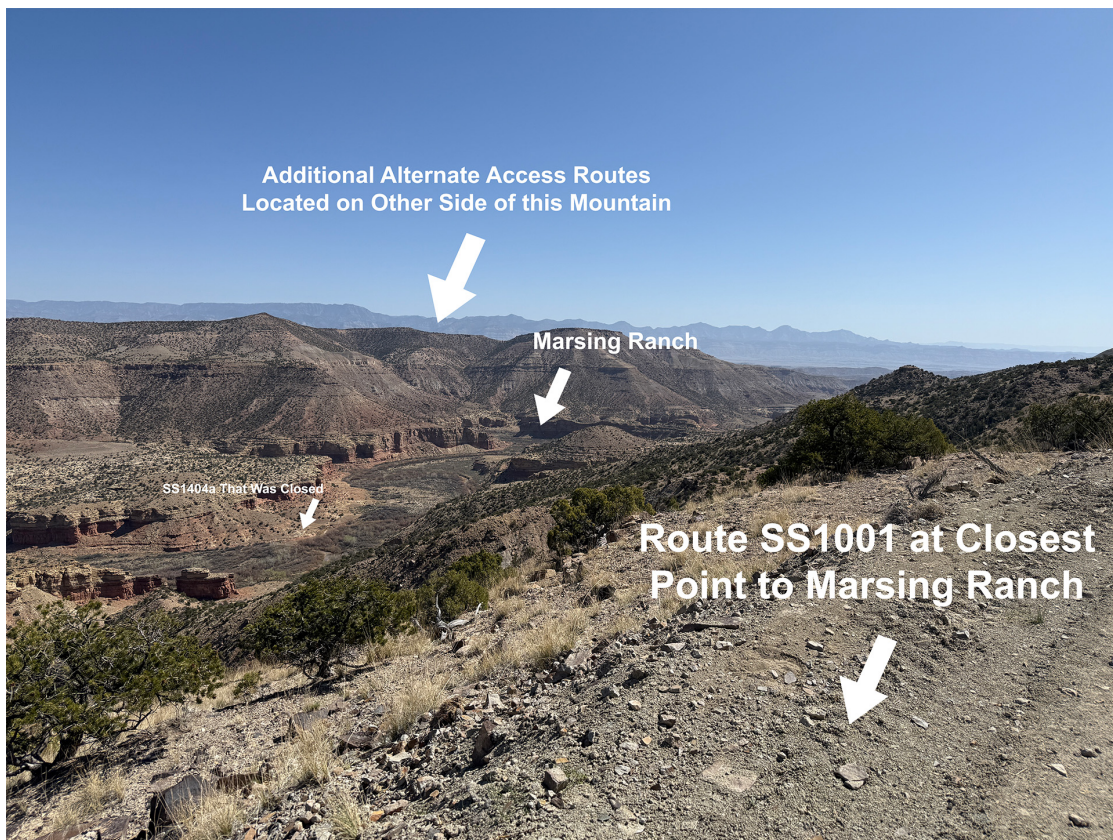


Photo 1 - View from SS1001, the now closest access route to the Marsing Ranch.